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March 28, 2024

VIA ECF

Hon. Victoria Reznik
U.S. Magistrate Judge
Southern District of New York
300 Quarropas Street
White Plains, New York 10601-4150

Re: *The Wave Studio, LLC v. General Hotel Management Ltd. et al.*,
Case No. 7:13-cv-09239-CS-VR and Related Case No. 7:15-CV-07950

Dear Judge Reznik:

We are counsel for British Airways PLC in the matter *The Wave Studio, LLC v. British Airways PLC, et al.*, Case no. 7:15-cv-07950-CS, which has been consolidated with the above-captioned case. We write pursuant to your March 12, 2024 Order (ECF No. 354), directing all Defendants who have not yet disclosed their insurance information to Plaintiff to do so by no later than March 29, 2024.

In line with the Court's Order, we have continued to work diligently to determine any insurance coverage. We unfortunately have not yet been able to complete that investigation and definitively determine whether or not there is applicable insurance coverage. The investigation has been complicated by the length of time over which the alleged claims occurred and the need to consult with related entities in the UK that may have held relevant insurance coverage. These conversations are ongoing with UK insurers consulting with underwriters to determine whether particular policies apply and/or were triggered by this litigation. Despite its best efforts, British Airways has not yet been able to complete what has become a complex investigation, and therefore respectfully requests additional time to provide any insurance information to Plaintiff. We hope to be able to provide this information within the next couple of weeks. In the interim, we have reached out to Plaintiff to engage in pre-mediation settlement discussions.

Regards,

A handwritten signature in black ink, appearing to read 'W. Frankel', written over a light blue circular stamp.

William H. Frankel